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January 24, 2003

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

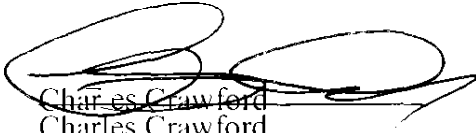
Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
The Portals II  
445 12<sup>th</sup> Street, S.W.  
Room TW-A325  
Washington, D.C. 20554

Re: Petition for Rule Making  
Vinton, Louisiana MB Docket No. 02-212  
Reply to Opposition to Motion for Leave to  
File Reply Comments

Dear Ms. Dortch:

Enclosed is an original and four (4) copies of my Reply to Opposition to Motion for Leave to File Reply Comments in MB Docket No. 02-212 (Amendment of Section 73.202(b), Table of Allotments, FM Broadcast Stations (Vinton, Louisiana, Crystal Beach, Winnie, and Lumberton, Texas)).

Respectfully submitted.



Charles Crawford  
Charles Crawford  
4553 Bordeaux Ave.  
Dallas, Texas 75205

(214) 520-7077 Tele  
(214) 443-9308 Fax

VintonReplytoOppositionLet

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Before the  
**Federal Communications Commission**  
Washington, D.C. 20554

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**JAN 27 2003**

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of )  
 )  
Amendment of 73.202 (h) ) MB Docket No. 02-212  
Table of Allotments ) RM-10516  
FM Broadcast Stations )  
(Vinton, LA, Crystal Beach, Winnie, )  
and Lumberton, TX )

To: John Karousos, Assistant Chief  
Audio Division of the  
Media Bureau

**REPLY TO OPPOSITION TO MOTION  
FOR LEAVE TO FILE REPLY COMMENTS**

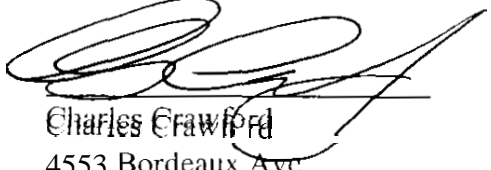
I, Charles Crawford, submit this "Reply to Opposition to Motion for Leave to File Reply Comments" to the "Opposition to Motion for Leave to File Reply Comments" filed by Tichenor License Corporation on January 14, 2003 in the above captioned proceeding

I stand by the good cause showing in the motion. If the Commission had rejected Tichenor's argument in the Galveston-Missouri City proceeding, then it might have been acceptable for Tichenor to fail to mention its earlier, rejected argument. However, the Commission took no action on the argument there and accordingly Tichenor is still on record as forcefully criticizing -- sans any agency ruling to the contrary -- the very maneuver it wants to carry out here. In those circumstances, a thoughtful party would have called this about-face to the attention of the Commission, distinguishing the factual circumstances if it could, rather than remaining silent in a pleading to which no further pleadings are normally allowed with the apparent expectation that the matter would never

come up.

The factual information provided in this "Reply to Opposition to Motion for Leave to File Reply Comments" is correct and true to the best of my knowledge.

Respectfully submitted.

A handwritten signature in black ink, appearing to read "Charles Crawford", written over a horizontal line.

Charles Crawford  
4553 Bordeaux Ave.  
Dallas, Texas 75205

(214) 520-7077      Tele  
(214) 443-9308      Fax

cc: Gene A. Bechtel, Law Office of Gene Bechtel, suite 600, 1050 17<sup>th</sup> Street, N.W., Washington, D.C. 20036, tele: (202) 406-1289, fax: (301) 762-0156, attorney for the Petitioner. It is requested that the Commission and any parties who may file pleadings in the captioned matter serve copies to Mr. Bechtel as well as the Petitioner.

January 24, 2003

## **CERTIFICATE OF SERVICE**

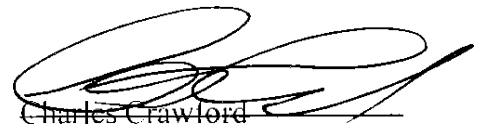
**I, Charles Crawford, hereby certify that on this 24<sup>th</sup> day of January, 2003, I caused copies of the foregoing "Reply to Opposition to Motion for Leave to File Reply Comments" to be placed in the U.S. Postal Service, first class postage prepaid, addressed to the following persons:**

John Karousos, Assistant Chief  
Audio Division of the Media Bureau  
Federal Communications Commission  
Portals II, Room 3-A266  
445 12<sup>th</sup> Street SW  
Washington, D.C. 20554

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Washington, D.C. 20005  
(Counsel for Tichenor License Corporation)

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1920 N Street, NW, Suite 300  
Washington, DC 20036-1622  
(Of Counsel for Tichenor License Corporation)



Charles Crawford